



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DSS/UAD/RMT
F.#2012R00387

*271 Cadman Plaza East
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August 24, 2015

By FedEx

Richard Ware Levitt, Esq.
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Re: United States v. Alexander Fishenko, et al.
Criminal Docket No. 12-626 (S-1) (SJ)

Dear Counsel:

Pursuant to the pretrial disclosure schedule agreed to by the parties, and as set forth in the attached list, enclosed herewith is a compact disc containing materials that the government is producing pursuant to Title 18, United States Code, Section 3500. Please note that these materials are being produced subject to a protective order. Please also note that, for certain witnesses, including Lyudmila Bagdikian, Terry Borges, Cindy Downey, Viktoria Klebanova, Kari McIntosh and Ben Liem, additional communications involving these witnesses were previously produced in connection with the government's Rule 16 disclosures. Finally, please note that this production includes material for two additional witnesses who were not listed on the government's witness list of August 10, 2015: Robert Brown and Brian Jacobsen.

In addition to the materials enclosed herewith, the government is also producing today additional classified materials pursuant to Title 18, United States Code, Section 3500 for witnesses Ronald Jones, Ryan Dusek and David Shrader. These materials

